

**ENFORCEMENT CONFIDENTIAL**

**Project Plan\***  
**EPA, Region III**  
**Office of Enforcement Compliance and Environmental Justice (OECEJ)**  
**ESC, Fort Meade, Maryland**  
**Super Salvage**

<b>Project Information</b>	
Project Name:	<b>Super Salvage</b>
Location:	<b>1711 1<sup>st</sup> Street SW Washington, D.C.</b>
Case Number:	<b>NA</b>
Project Leader:	<b>Gerard Crutchley</b>
Preparation Date:	<b>5/22/2013</b>

<b>Project Implementation</b>	
Sampling:	All sampling will be conducted by technical personnel from EPA, Region III's Office of Enforcement, Compliance and Environmental Justice
Analysis:	Laboratory analysis will be conducted by the Office of Analytical Services & Quality Assurance Branch (EPA, Region III laboratory) at the Environmental Science Center in Fort Meade, Maryland

<b>Introduction/Background</b>	
<p>This project plan outlines the field work and analytical requirements necessary to support a multi-media investigation at the Super Salvage facility located in Washington, D C. The facility is a metal recycling facility. This facility was inspected by personnel from the District Department of the Environment in March 2010 at which time, the inspection personnel observed various types of fluids leaking from storage boxes, automotive parts, and also from buildings on site. The inspectors also observed two areas at the facility where fluids/water accumulate in small ponds/impoundments. The facility personnel at that time stated that they allow they allow the fluids/water to evaporate and/or to drain into the ground soil. The inspectors also noted that the majority of the property is unpaved and they observed severe contamination of the soils in and around the property. They also indicated that maintenance of disposal records and manifest was very poor. A more recent inspection of the facility conducted in February 2013 by contractors for the EPA and EPA/Region III's NPDES Enforcement Branch revealed very similar conditions at the facility as were observed</p>	

\* *Work actually performed may be modified from work described in this project plan.*

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during the 2010 inspection. Information obtained from the inspection personnel during the 2013 inspection indicated they observed numerous hazardous materials accumulating throughout the facility. In April 2013 an anonymous complaint was received into the Region III's NPDES Enforcement Branch which indicated that the facility continues to burn all sorts of materials on cloudy days and the ash and smoke cause difficulty in breathing to anyone in the vicinity. They are also dumping/creating runoff into a pool of standing water on the site.

<b>Project/Task Description</b>
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<p>The EPA, Region III's NPDES Enforcement Branch has some very great concerns regarding the conditions at this facility and has requested that EPA, Region III's Office of Enforcement, Compliance and Environmental Justice (OECEJ) conduct a multi-media investigation of this facility. The investigation has been scheduled for May 28, 2013. OECEJ personnel will conduct a multi-media screening investigation to gather information regarding the facility's operations as they relate to a number of environmental programs (e.g. hazardous waste, air, water, toxics, etc). The OECEJ personnel plan to conduct field screening of materials and soils observed on site and based on screening results collect evidentiary samples for laboratory analysis. All sample locations and site conditions will be documented in field notebooks. Chain of custody and document control procedures will be followed throughout the investigation as described in the Sample Submission Procedures for the Office of Analytical Services &amp; Quality Assurance Laboratory Branch (Revision 12.0, January 2009), EPA, Region III.</p>
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<b>Data Quality Goals/Data Review/Assessment</b>
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<p>Data quality goals for the measurement data in this project are based upon the legal requirement for evidence in enforcement cases. Sampling methods will be selected so as to assure that the data obtained will be the type and quality needed for the investigation. Ultimately, the decision as to whether certain measurements can be used in an enforcement case is made by the government's counsel in consultation with the technical personnel/scientists responsible for the measurement.</p>
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<b>Sampling and Measurements Design/Methods</b>
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<p>The sampling design for this project will depend upon case objectives. These objectives may change during the investigation, possibly resulting in the sampling design/collection being modified in the field. All procedures actually used will be documented in the field logbook.</p>
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<b>Sample Handling/Custody</b>
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<p>The procedures for handling and custody of the samples collected during this investigation are documented in the "Sample Submission Procedures" for the Office of Analytical Services &amp; Quality Assurance Laboratory Branch (Revision 12.0, January 2009), EPA, Region III.</p>
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Analytical Methods
<p>The analytical methods selected will depend upon case objectives. Analytical methods followed will be documented.</p> <p>The specific analytical requirements will be determined through discussions between field and laboratory personnel following the completion of on-site activities.</p>

Quality Control Procedures
<p>Quality control procedures applicable to a particular sampling or analytical method will be followed.</p>
Project Schedule
<p>On-site Inspection: May 28, 2013</p> <p>Laboratory Analyses: Laboratory analysis will begin within approximately one week of receipt of samples into the laboratory</p> <p>Report of Findings: Analytical results will be available approximately five weeks from receipt of the samples by the laboratory</p>
Safety Procedures
<p>The safety hazards which may be encountered and personnel protection requirements for field activities are described in the attached Field Hazard Assessment form (Field Trip Activities Sheet, EPA, Region III).</p>

Prepared by:	Gerard Crutchley, US EPA, Region III, OECEJ, Fort Meade, Md.
	Date: May 22, 2013
Approved by:	Field Branch Chief: Jose Jimenez
	Date: May 22, 2013